



Barry Coburn <barry@coburngreenbaum.com>

Re: [EXTERNAL] Re: Witness and exhibit disclosures

1 message

Barry Coburn <barry@coburngreenbaum.com>

Wed, Apr 2, 2025 at 9:18 AM

To: "Pomerantz, Lara (USANYS)" <Lara.Pomerantz@usdoj.gov>

Cc: "Monteleoni, Paul (USANYS)" <Paul.Monteleoni@usdoj.gov>, Sarah Schwietz <sarah@coburngreenbaum.com>, Marc Eisenstein <marc@coburngreenbaum.com>, "Richenthal, Daniel (USANYS)" <Daniel.Richenthal@usdoj.gov>, "Ghosh, Catherine (USANYS)" <Catherine.Ghosh@usdoj.gov>

Bcc: Barry Coburn <barry@coburngreenbaum.com>

Thanks for your note, Lara. I take it then that the government concedes that these witnesses' names were not previously disclosed. With respect to the intended testimony of your IRS witness, we would request a proffer. Best regards, Barry

Barry Coburn
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On Tue, Apr 1, 2025 at 9:18 PM Pomerantz, Lara (USANYS) <Lara.Pomerantz@usdoj.gov> wrote:

Hi Barry,

These individuals are covered by our prior letters to you. In our January 14, 2025 letter to you, we notified you that we may call “[d]ocument/records custodians as necessary, in the event that no satisfactory stipulation is reached.” In our March 4, 2025 letter to you, we notified you that we may call certain individuals as witnesses in our case-in-chief, including “[a]dditional document/records custodians, or other witnesses to testify concerning the authentication of documents and related matters, as necessary.” In connection with our March 4, 2025 production of witness-related materials to you, we produced documents for a Meta custodian under 3500 number 3579. On March 14, 2025, we produced materials to you for the identified custodian, Raquel Morgan, under 3500 number 3589.

We produced to you this evening materials for Denise Clemons under 3500 number 3590; she was recently identified by JP Morgan Chase as the relevant witness. We previously produced non-testifying witness material for Jordan Bellamy on March 14 that indicated that JP Morgan Chase was identifying a witness to testify at trial, and late last week they notified us Ms. Clemons would be that witness but we had no 3500 material for her until today.

Thanks,

Lara

Coburn, Greenbaum & Eisenstein PLLC will Be EXTERNAL Re: Witness and exhibit disclosures

From: Barry Coburn <barry@coburngreenbaum.com>
Sent: Tuesday, April 1, 2025 6:06 PM
To: Monteleoni, Paul (USANYS) <Paul.Monteleoni@usdoj.gov>
Cc: Sarah Schwietz <sarah@coburngreenbaum.com>; Marc Eisenstein <marc@coburngreenbaum.com>; Richenthal, Daniel (USANYS) <Daniel.Richenthal@usdoj.gov>; Pomerantz, Lara (USANYS) <Lara.Pomerantz@usdoj.gov>; Ghosh, Catherine (USANYS) <Catherine.Ghosh@usdoj.gov>
Subject: [EXTERNAL] Re: Witness and exhibit disclosures

Thanks Paul. Are either of these folks on prior witness lists?

- Raquel Morgan
- Denise Clemon

Best, Barry

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On Tue, Apr 1, 2025 at 4:30 PM Monteleoni, Paul (USANYS) <Paul.Monteleoni@usdoj.gov> wrote:

We hope your client is feeling better. Depending on the pace of trial, on Thursday and Friday we may call the following witnesses and offer in connection with their testimony the following exhibits (in addition to those already disclosed):

Olivia Sebade: 2499

Sean Giesler: 7K-127, 7K-204

Denise Clemons: 2461

Isabella Fuchs: 1335A, 1335B, 1335C, 1335-EX, 1360

Philip Sellinger: 8M-1, 12A-1, 12A-2, 12A-3, 12E-1

Michael Soliman: A129, A130, A131, A421, A422

Raquel Morgan: no exhibits

Nicholas Iorio: 12B-9, 2435-13 (demonstrative)

Paul Van Wie: 8Q-6, 8Q-12, 2A-29

Paul M. Monteleoni

Senior Trial Counsel

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